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THERAPEUTICS, INC.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

**ENDONOVO THERAPEUTICS, INC.,
a Delaware Corporation,**

Case No. 5:19-cv-00257-JAK-KK

Plaintiff,

v.

**KVP INTERNATIONAL, INC., a
California Corporation.**

Defendant.

**DECLARATION OF LEWIS E.
HUDNELL, III IN SUPPORT OF
PLAINTIFF ENDONOVO'S
MOTION TO DISMISS ALL
CLAIMS WITHOUT PREJUDICE
UNDER FED. R. CIV. P. 41(a)(2)**

Judge: Hon. John A. Kronstadt

I, Lewis E. Hudnell, III, declare as follows:

1. I am a special counsel to Manning & Kass Ellrod, Ramirez, Trester LLP. I am duly licensed to practice law in the States of New York and California and admitted to this Court. I have personal knowledge of the facts in this declaration, and I am competent to testify to them if called to do so.

2. A true and correct copy of the Amended and Restated License Agreement between Rio Grande Neurosciences (“RGN”) and AAH Holdings, LLC (“Assisi”) dated October 1, 2016 (“the October 2016 License Agreement”) is attached as Exhibit 1 to my declaration.

Case No.5:19-cv-00257-JAK-KK

**DECLARATION OF LEWIS E. HUDNELL, III IN SUPPORT OF PLAINTIFF ENDONOVO'S MOTION TO
DISMISS ALL CLAIMS WITHOUT PREJUDICE UNDER FED. R. CIV. P. 41(a)(2)**

3. During the meet and confer that preceded Endonovo’s Motion to Dismiss, Endonovo raised the issue that Assisi is arguably a necessary party. KVP did not dispute that Assisi is arguably a necessary party.

4. During the meet and confer that preceded Endonovo's Motion to Dismiss, Endonovo asserted that Assisi could be joined to this case under Fed. R. Civ. P. 19. KVP did not contest this assertion.

I declare under penalty of perjury that the statements in this declaration are true and correct and that I executed this declaration on October 7, 2019.

Lewis E. Reddell

Lewis E. Hudnell, III

**MANNING & KASS
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ATTORNEYS AT LAW